

**REMARKS**

1. Status of Claims:

Claims 1-84 are pending in the application. Claims 1-84 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent Application Publication No. 2002/0097724 to M. Halme et al, published July 25, 2007, filed October 19, 2001 (Halme) and further in view of US Patent Application Publication No. 2002/0078227 to S. Kronenberg *et al.*, published June 20, 2002, filed July 20, 2001 (Kronenberg).

Claim 85 has been added to provide additional protection for applicant

To expedite prosecution, applicants limit the response to the rejection of the independent claims 1, 21, 41, 51, 61, 67, 73, 77 and 81, while reserving the right to respond to the rejection of the dependent claims 2-20; 22-40; 42-50; 52-60; 62-66; 68-72; 74-76, 78-80, and 81-84 after examination of the independent claims.

2. Response to the Rejections under 35 U.S.C. § 103

Claims 1, 21, 41, 51, 61, 67, 73, 77 and 81 include features not disclosed or suggested in Halme in view of Kronenberg, and overcome the rejection under 35 U.S.C. § 103 (a), as follows:

A. Claims 1, 21 and 41 are as follows:

(i) a memory device; and a processor disposed in communication with the memory device, the processor configured to:

The Examiner contends that Halme at Paragraph 0115 discloses in Figures 8 and 9 the subject matter of feature (i). Figures 8 and 9 disclose a network element cluster for processing data packets. The network element cluster elements comprise means for determining distribution decisions on the basis of certain fields of data packets according to predetermined criteria. *In contrast, applicants disclose providing secure communications between applications in a piconet wherein the memory contains software to facilitate inter communication. In Halme, the distribution of data packets in a network does not equate to providing secure*

*communications between applications in a piconet. Halme addresses a different problem. The solution disclosed by Halme does not suggest to a worker skilled in the art that secure communication between applications in a piconet particularly where security associations between applications are created by applicants*

(ii) store an application directory having at least one entry, each entry including an application program identifier, attributes, and security parameters;

*Halme at Paragraph 0115 does not disclose nor has applicants found in Halme an application directory in a node or node cluster or in a network, the directory having at least one entry for each application in the piconet, as described in applicants' specification at Paragraph 0023. Halme fails to disclose or suggest the subject matter of feature (ii).*

(iii) determine a priority for each entry in the application directory;

*Halme discloses in Figure 2 that data packets are distributed according to certain fields of the data packets. The Examiner has not identified nor has applicants found in Halme a prioritization of entries in an application directory as described in applicants' specification at Paragraphs 0030 and 0034. Halme fails to disclose the subject matter of feature (iii)*

(iv) identify a selected entry based on the priority;

*The Examiner contends that Halme at Paragraph 0026 discloses the subject matter of feature (iv). Paragraph 0026 discloses that data packet distribution decisions are based on certain fields of the data packets. In contrast, applicants' specification at Paragraph 0012 discloses identifying an entry in the directory of an application based on priority. Halme fails to disclose an application directory, entries in the directory, prioritization of entries and selecting an entry based on the priority of the entry.*

(v) examine the attributes and the security parameters for the selected entry;

*The Examiner contends that Halme at Paragraphs 0026-0027 disclose the subject matter of feature (v). The cited Paragraphs describe distribution decisions for data packets based on certain fields and processing the data packets in the nodes by selecting arbitrary values for at least one of the certain fields. The Examiner has not identified nor has applicants found any disclosure in Halme related to examining attributes and security parameters of a selected entry in an application directory for establishing a data communication between applications, as described in applicants' specification at Paragraph 0012. The determination of distribution*

*decision in Halme does not equate to examining attributes and security parameters of entries in a directory. Halme fails to disclose or suggest the subject matter of feature (v).*

and

(vi) establish a security association to support a data communication when the security parameters direct the selected entry to use a secure connection.

The Examiner contends that Halme at Paragraphs 0030-0031 describe the subject matter of feature (vi). The cited text discloses processing data packets at the nodes using different fields than data-packet-type-specific and including security parameters in the data packets. *The Examiner has not identified in Halme establishing security associations between piconet applications. Further, there is no disclosure in Halme directing a secure connection, according to the security parameters. Kronenberg at Paragraphs 0055-0057 does not provide the missing feature in Halme to a worker skilled in the art. The cited Paragraphs describe re-sequencing of fragmented IP datagrams. The cited Paragraphs have nothing to do with security associations of application in a server-terminal connection, wherein the security parameters direct an entry in the applications to use a secure connection for a data communication. Halme and Kronenberg, alone or in combination, fails to disclose the subject matter of feature (vi)*

Summarizing, the cited art discloses distributing data packets of communication connections to nodes in network clusters, wherein distribution decisions are made on the basis of certain fields of the data packets according to predetermined criteria. The packets are distributed in a network according to the distribution decision made at the nodes.

*There is no disclosure in the cited art of controlling communications between applications of devices in a piconet by: (1) installing in each device a directory of applications in the piconet; (2) providing application identifiers, attributes, and security parameters for each application; (3) examining attributes and security parameters of an application to determine the need for a secure connection between applications for data communications, and (4) establishing a secure connection when the security parameters direct a secure connection.*

The rejection of claims 1, 21 and 41 under 35 U.S.C. § 103 (a) is without support in the cited art. Withdrawal of the rejection and allowance of claims 1, 21 and 41 are requested.

B. Claim 51:

The Examiner contends that Halme at Paragraphs 0012-0015 describes the claimed subject matter of claim 51. Paragraphs 0012-0015 briefly describe the IP Protocol Suite (RFC 2400); Security Associations (RFC 2401) as background for secure connections between node clusters. Claim 51 is in means plus function format and corresponds to and includes the features of claims 1, 21 and 41. *Claim 51 is patentable over Halme in view of Kronenberg on the same basis as claim 1 i.e. the failure of the cited art to disclose or suggest (1) installing in each device a directory of applications in the piconet; (2) providing application identifiers, attributes, and security parameters for each application; (3) examining attributes and security parameters of an application to determine the need for a secure connection between applications for data communications, and (4) establishing a secure connection when the security parameters direct a secure connection..*

The rejection of claim 51 under 35 U.S.C. § 103 (a) is without support in the cited art. Withdrawal of the rejection and allowance of claim 51 is requested.

C. Claims 61 and 81

Claims 61 and 81 have been rejected on Halme in view of Kronenberg based on the same rationale for rejecting claim 1. Claim 1 has been previously distinguished from Halme in view of Kronenberg. Claims 1 and 81 include additional features to those recited in claim 1. The additional features are not commented on by the Examiner. The additional features are as follows:

Claim 61:

- (i) store a security association between the wireless device and the nearby wireless device when the nearby wireless device enters the ad-hoc network for a first encounter;
- (ii) store a copy of the security association;
- (iii) remove the security association when the first encounter terminates; and
- (iv) establish a secure connection to the nearby wireless device based on the copy of the security association when the nearby wireless device enters the ad-hoc network for a second encounter.

Claim 81:

- (i) a display list storing at least one previous connection between the wireless device and the nearby wireless device,

(ii) a user operates an input device connected to the wireless device to identify one of said at least one previous connection as a selected previous connection,

(iii) the user operates the input device connected to the wireless device to launch the application program associated with the selected previous connection, configure the secure connection using the security parameters associated with the selected previous connection, and communicate over the secure connection with the counterpart application program.

The rejection of claims 61 and 81 under 35 U.S.C. § 103 (a) is without support in the cited art. Withdrawal of the rejection and allowance of claims 61 and 81 are requested.

D. Claims 67 and 77:

Claims 67 and 77 have been rejected on Halme in view of Kronenberg (cited art) based on the same rational for rejecting claim 61. Claim 61 has been previously patentably distinguished from the cited art. Claims 67 and 77 describe claim 61 in different formats (method and means plus function) and are patentably distinguishable from the cited art on the same basis as claim 67 is patentably distinguishable from the cited art.

The rejection of claims 67 and 77 under 35 U.S.C. § 103 (a) is without support in the cited art. Withdrawal of the rejection and allowance of claims 67 and 77 are requested.

E. Claim 73:

Claim 73 has been rejected on the same basis as claim 61 and on Halme at Paragraphs 0071-0075. Claim 73 describes claim 61 in program product format. Claim 61 has been previously patentably distinguished from Halme in view of Kronenberg (cited art). The cited Paragraphs describe examples of data packets, header fields, and secure communications among network clusters in Halme. The cited Paragraphs do not provide the missing features in the cited art described in the consideration of claim 61.

The rejection of claims 73 under 35 U.S.C. § 103 (a) is without support in the cited art. Withdrawal of the rejection and allowance of claim 73 are requested.

3. Patentability Support for New Claim 82:

Claim 85 is supported in the specification as follows;

a first network element (210/260) for storing an application directory (230/280) having at least one entry, each entry including an application program identifier, attributes, and security parameters;

a second network element (314) for determining a priority for each entry in the application directory;

a third network element (316) for identifying a selected entry based on the priority;

a fourth network element (318) for examining the attributes and the security parameters for the selected entry; and

a fifth network element (324) for establishing a security association to support the data communication when the security parameters direct the selected entry to use a secure connection.

Claim 85 describes claim 51 in apparatus form and is patentable over the cited art on the same basis as claim 51. Entry and allowance of claim 85 are requested.

### **CONCLUSION**

Applicants have demonstrated that Halme and Kronenberg, alone or in combination, fail to disclose or suggest controlling communications in an ad-hoc network of devices by: (1) installing in each device a directory of applications in the piconet; (2) providing application identifiers, attributes, and security parameters for each application; (3) examining attributes and security parameters of an application to determine the need for a secure connection between applications for data communications, and (4) establishing a secure connection when the security parameters direct a secure connection. Entry of the amendment; withdrawal of the rejection under 35 U.S.C. § 103 (a); allowance of claims 1-85, and passage to issue of the application are requested.


### **AUTHORIZATION**

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. **13-4500**, Order No. **4208-4163**.

In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No 13-4500, Order No. 4208-4163.

Respectfully submitted,  
MORGAN & FINNEGAN, L.L.P.

Dated: November 16, 2007

  
\_\_\_\_\_  
Joseph C. Redmond, Jr.

Registration No. 18,753

Correspondence Address:

Address Associated With Customer Number:

27123

(202) 857-7887 Telephone

(202) 857-7929 Facsimile